



October 4, 2015

VIA ECF

Hon. James C. Francis IV
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Cat3, LLC, et al. v. Black Lineage, Inc., et al., Case No. 14-CV-5511: Joint Letter Motion
Requesting an Extension of Time to Propose Discovery Schedule

Dear Judge Francis,

We represent the Plaintiffs in the above-named action. We are writing regarding the Court's recent order (DE 73, "Order") granting Plaintiffs' leave to file a 2nd Amended Complaint. Plaintiffs filed the 2nd Amended Complaint on September 27, 2015, and Defendants' answer is due on October 21, 2015. The Court's Order required the parties to confer and submit a proposed amended discovery schedule by this Monday, Oct. 5.

We are writing jointly with the consent of counsel for the Defendants to inform the Court that the parties believe it is premature to propose a schedule to the Court without knowing what the contents of Defendants' answer to the 2nd amended complaint will be, as the scope of discovery will be dependent upon any affirmative defenses and/or counterclaims the Defendants submit. Accordingly, the parties jointly and respectfully request that the Court extend this deadline for filing a joint, proposed discovery schedule to 10 days after Defendants file their answer to the 2nd Amended Complaint.

The parties hereby certify that they believe the extension requested above is made in good-faith and for just cause.

Sincerely,

Nicholas R. Lewis